1		DIRECT TESTIMONY OF
2		HUBERT C. YOUNG, III
3		ON BEHALF OF
4		SOUTH CAROLINA ELECTRIC & GAS COMPANY
5		DOCKET NO. 2009-327-E
6		
7	Q.	PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION.
8	A.	My name is Hubert C. Young, III. My business address is 601 Old Taylor
9		Road, MC J37, Cayce, South Carolina 29033. I am employed by South Carolina
10		Electric & Gas Company ("SCE&G" or "Company") where I am the Manager of
11		Transmission Planning.
12	Q.	PLEASE DESCRIBE YOUR EDUCATIONAL AND BUSINESS
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	Q. A.	
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1 Q. ARE YOU A MEMBER OF ANY INDUSTRY COMMITTEES FOR 2 SYSTEM RELIABILITY ASSESSMENT OR PLANNING?

3 A. I am currently a member of the North American Electric Reliability 4 Corporation ("NERC") Reliability Assessment Subcommittee, the NERC Standards 5 Authorization Request Ballot Body, the SERC Reliability Corporation (formerly 6 known as the Southeastern Electric Reliability Council and hereinafter referred to as 7 "SERC") Engineering Committee, the SERC Engineering Committee Executive Committee, the SERC Reliability Review Subcommittee, the SERC Regional 8 9 Studies Executive Committee, the VACAR/Southern/TVA/Entergy Executive 10 Committee where I currently serve as chair, and the VACAR (Virginia/Carolinas – 11 includes SCE&G, Duke Energy Carolinas, Progress Energy Carolinas, Virginia 12 Power, Santee Cooper, SEPA, NCEMC, and Fayetteville, NC) Executive 13 Committee.

All of these committees are directly involved with setting reliability standards for the electric power industry or assessing the current and future capabilities of the integrated transmission grid in North America, the Southeast, and the Virginia/Carolinas.

18 Q. PLEASE SUMMARIZE YOUR DUTIES AS MANAGER OF 19 TRANSMISSION PLANNING AT SCE&G.

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A. I oversee the planning and associated analyses of the SCE&G electric transmission system and all interconnection transmission facilities with neighboring utilities to ensure a reliable and cost effective delivery of electric

power to SCE&G customers while developing and maintaining strategically supportive infrastructure to sustain and further South Carolina's economic development and the Company's financial integrity.

4 Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.

A.

A.

The purpose of my testimony is to respond to the allegations made by Michelle and James Smith (collectively, the "Smiths") in their Complaint dated August 3, 2009, filed against SCE&G. Based upon my reading of the Complaint, it is my understanding that the Smiths disapprove of the route SCE&G selected to construct a 2.4 mile long, 115 kilovolt ("kV") transmission line ("Pritchardville 115 kV Line"). My testimony will discuss the need for the new Pritchardville 115 kV Line and the process by which SCE&G selected the route for the new 115 kV line.

12 Q. WHAT CRITERIA DOES SCE&G USE TO DETERMINE WHEN NEW 13 TRANSMISSION FACILITIES ARE NEEDED?

The Company uses external and internal criteria to guide its decision-making related to the development of new transmission facilities. Externally, our Company subscribes to the Transmission Planning Standards established by NERC and internally SCE&G adheres to its Long Range Planning Criteria. In accordance with these criteria, the SCE&G Transmission System is designed so that only short-time overloads, low voltages, and local loss of load will occur during certain contingencies. After appropriate switching and re-dispatching, all non-radial loads can again be served with reasonable voltages, and all facilities

- can again operate within acceptable limits. A *sample* of contingencies considered
- 2 includes:
- 3 1. Loss of any generator;
- Loss of any transmission circuit operating at a voltage level of 115 kV or above;
- 6 3. Loss of any transmission transformer;
- 4. Loss of any electrical bus and associated facilities operating at a voltage level of 115 kV or above;
- 9 5. Loss of entire generating capacity in any one plant;
- 10 6. Loss of all circuits on a common structure;
- 11 7. Loss of any generating unit simultaneously with the loss of a single transmission line;
- 8. Loss of all components associated with a breaker failure; and
- 9. Loss of any generator, transmission circuit, or transmission transformer, followed by manual system adjustments, followed by the loss of another generator, transmission circuit, or transmission transformer.

17 O. WHY IS THE PRITCHARDVILLE 115 kV LINE NEEDED?

18 A. The Towns of Bluffton and Hardeeville and the areas between, including
19 Pritchardville, are currently experiencing significant population growth, and
20 SCE&G's existing transmission lines and associated facilities are not adequate to
21 reliably serve the load growth in these areas in the years to come.

SCE&G's existing Bluffton Substation provides electrical energy to an extensive geographical region that includes Bluffton and the surrounding area. Generally, the existing substation serves homes and businesses west of Bluffton to New River, including the Pritchardville community. The existing distribution system served from existing substations does not have adequate electrical capacity to reliably serve the projected increasing electrical growth in the area starting now and into the future. The service area has been partially "backed-up" from the Hardeeville Substation when it became necessary to do so, but load growth in the area served by the Hardeeville Substation has now prevented this backup service option.

A.

SCE&G's new 115-23 kV substation, which will be located near the intersection of SC Highway 46 and Gibbet Road, will relieve load on the existing Bluffton and Hardeeville substations, allow new load to be served reliably, and ensure an adequate supply of electrical energy in the region. This new and needed substation will be connected to SCE&G's existing Hardeeville-Bluffton 115 kV Line via the new Pritchardville 115 kV Line.

Q. DID SCE&G CONSIDER OTHER POSSIBLE ALTERNATIVES TO THE NEW TRANSMISSION FACILITIES?

Yes. SCE&G considered several alternatives ranging from taking no action to increasing the capacity of existing facilities. In summary, the Company determined that these alternatives would not provide its customers with long-term electrical system reliability.

Q. PLEASE DESCRIBE THE PROCESS BY WHICH SCE&G SELECTED THE ROUTE FOR THE PRITCHARDVILLE 115 kV LINE.

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A. SCE&G conducted a comprehensive transmission line siting study to select the route for the Pritchardville 115 kV Line. As part of this study, SCE&G identified a 6.72 square mile geographic area through which any practical transmission route would pass. The Company collected and developed an array of environmental, land use, cultural resource, and aesthetic data that fully characterized the siting study area. From this information, SCE&G developed a suitability composite, which displayed areas of least constraint to routing, areas of highest constraint, and a full range of conditions in between. Using this composite, SCE&G identified seven potential routes for the Pritchardville 115 kV Line.

DID SCE&G NOTIFY THE PUBLIC OF THE SEVEN POTENTIAL ROUTES FOR THE PRITCHARDVILLE 115 kV LINE?

Yes. The Company presented these seven routes to the public at a community workshop in August 2005 held at the Shults Park Community Center in Bluffton. Two weeks before the community workshop, SCE&G mailed personal invitations to each of the 480 landowners of record in the 6.72 square mile siting study area. SCE&G included a questionnaire with the invitation to give landowners an opportunity to provide information and comments regarding the proposed line routes. These questionnaires were also available at the workshop, and those landowners who could not attend the workshop were

encouraged to mail their comments to SCE&G for consideration. Moreover, SCE&G notified local land developers as well as local elected officials of the community workshop and sought their input concerning the proposed routes.

Q.

Twelve (12) people attended the workshop, and fifty-five (55) questionnaires were completed and returned to the Company. At the community workshop, SCE&G encouraged the attendees to (i) carefully examine the seven proposed routes that were displayed on an array of mapping including aerial photography; (ii) visit various "workstations" where complete information was available regarding all aspects of the project; and (iii) offer any information concerning the proposed routes.

DID SCE&G CONSIDER THE PUBLIC COMMENTS IN ITS ROUTE SELECTION PROCESS?

Yes. Based on the information received from the public, local officials, and developers, the Company identified six additional routes bringing the total number of proposed routes to thirteen. These six additional routes represented minor deviations of the original proposed routes.

SCE&G also used the information gathered from the community workshop attendees and from the received community questionnaires to identify several categories that would be used to quantitatively and qualitatively compare the thirteen alternate routes against each other. These categories included, cultural and natural resource factors, current and future land use factors, public visibility factors, and residential visibility factors, to name a few.

1 Q. WHAT ROUTE DID SCE&G SELECT TO CONSTRUCT THE 115 KV 2 TRANSMISSION LINE?

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A. After analyzing a series of variables, including cost, the Company selected the route that minimizes the overall impact of the 115 kV Line. The selected route runs southwest along South Carolina Highway 170, then turns southeast and then southwest again towards Gibbet Road, and then parallels Gibbet Road in a southerly direction before turning east towards the new Pritchardville Substation, totaling 2.4 miles in length. Attached to my direct testimony as Exhibit No. ____ (HYC-1) is a map depicting the selected route corridor.

10 Q. DID SCE&G ADVISE THE PUBLIC OF THE ROUTE IT SELECTED?

11 A. Yes, on October 10, 2005, SCE&G mailed a letter to all landowners in the
12 siting study area and to numerous elected officials announcing the final route
13 selection.

Q. WHEN WILL THE NEW TRANSMISSION LINE BE BUILT?

15 A. Construction of the Pritchardville 115 kV Line began on April 6, 2009, and SCE&G anticipates completing the new transmission line by the end of 2009.

17 Q. IF THE ROUTE SELECTION WAS MADE IN OCTOBER 2005, WHY IS 18 THE TRANSMISSION LINE NOT YET CONSTRUCTED?

After the Company selected the route for the Pritchardville 115 kV Line, SCE&G focused its efforts on acquiring the necessary real property interests, including rights of way, and detailing and finalizing its engineering plans so as to make the least possible impact along the selected corridor.

1	Q.	TURNING TO THE SMITHS' COMPLAINT, THEY ALLEGE THAT
2		SCE&G "DID NOT CHOOSE THE MOST DIRECT ROUTE FOR THE
3		LINES" AND INSTEAD "CHOSE A ZIG-ZAG PATTERN" RUNNING
4		THROUGH LOWER INCOME NEIGHBORHOODS AND AVOIDING
5		WEALTHIER NEIGHBORHOODS. DID SCE&G CHOOSE A ZIG-ZAG
6		PATTERN OR CONSIDER THE ECONOMIC PROFILE OF THE
7		AFFECTED NEIGHBORHOODS IN DECIDING WHERE TO ROUTE
8		THE PRITCHARDVILLE 115 kV LINE?

A.

- Absolutely not. SCE&G chose the most direct route available based on current and future development and environmental impact factors. Further, the economic profile of the affected neighborhoods played no role whatsoever in the route selection process for the Pritchardville 115 kV Line. Notably, the route does not impact or cross the Smiths' property.
- Q. PLEASE BRIEFLY RESPOND TO THE SMITHS' ALLEGATION THAT

 "SCE&G FAILED TO NOTIFY RESIDENTS IN THE NEIGHBORHOOD

 OF GIBBET ROAD WHO PURCHASED PROPERTY AFTER AUGUST

 18, 2005" OF THE SELECTION OF THE ROUTE RUNNING ALONG

 GIBBET ROAD.
 - A. As I testified earlier, SCE&G mailed a letter to all landowners in the siting study area announcing the final route selection. SCE&G is not aware of any law requiring the Company to continue to monitor real estate transactions in the general vicinity of the line construction and to ensure that any subsequent

- purchasers of real estate have actual knowledge of the impending construction in SCE&G's own rights of way.
- Q. WAS SCE&G REQUIRED TO SEEK COMMISSION APPROVAL
 BEFORE COMMENCING CONSTRUCTION OF THE

5 PRITCHARDVILLE 115 kV LINE?

- 6 A. No. Pursuant to the Utility Facility Siting and Environmental Protection 7 Act—specifically South Carolina Code Sections 58-33-20(2)(b) and 58-33-110(1)—and Commission Regulation 103-304, SCE&G is not required to obtain 8 9 Commission approval of its route selection when constructing a transmission line 10 with an operating voltage of less than 125 kV. The new Pritchardville 11 transmission line is designed and will be operated at 115 kV, and therefore, under 12 existing South Carolina law, SCE&G is not required to seek Commission approval 13 prior to constructing the Pritchardville 115 kV Line.
- 14 Q. HOW DO YOU RESPOND TO THE SMITHS' ASSERTION THAT
 15 SCE&G USED INTIMIDATION TACTICS IN SECURING RIGHTS OF
 16 WAY OVER WHICH TO CONSTRUCT THE PRITCHARDVILLE 115kV
 17 LINE?
- I reject the Smiths' baseless accusation. At no time whatsoever has

 SCE&G used intimidation tactics to secure rights of way over which to construct

 the Prichardville 115 kV line. Indeed, such intimidation tactics would be wholly

 inconsistent with our Company's core values—namely, to communicate openly

 and honesty and to always do what is right. Consistent with these core values,

SCE&G conducted an open route selection process in which it proactively solicited input from the public. Furthermore, the Company acquired the necessary rights of way through traditional—and most certainly legal—means.

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Q.

IN THEIR COMPLAINT, THE SMITHS ASK THE COMMISSION TO REQUIRE SCE&G TO BURY THE PRITCHARDVILLE 115 kV LINE BECAUSE IN THEIR OPINION "ONE MILLION PER MILE COST WOULD BE MONEY WELL SPENT." HOW DO YOU RESPOND TO THE SMITHS' REQUEST?

In my experience, the cost of burying a transmission line far exceeds one million dollars per mile. Therefore, burying the Pritchardville 115 kV Line underground would most assuredly not be money well spent. From the Company's perspective, SCE&G is responsible for both least-cost planning and system reliability. Placing the new transmission line underground would assist neither objective as it would increase our customers' electric bill without improving system reliability for its customers.

From the customers' perspective, burying transmission lines significantly raises the costs of the lines as compared to the costs of overhead transmission lines due to higher design, installation, and maintenance costs. SCE&G would eventually seek recovery of these costs from its customers in our service area. Notably, the Smiths are not SCE&G customers, and therefore they are asking SCE&G customers to bear a significant cost burden for their aesthetic view of the line. Moreover, it typically takes more time to locate a failure, diagnose a problem

and repair an underground transmission line than it does a typical overhead transmission line; and once lines are placed underground, there is little to no flexibility to upgrade the facilities to respond to changes on the system. It is also important to note that this 115 kV line is the only source to the new Pritchardville substation and could be out of service for an extended period of time if installed underground. For the same reasons the Pritchardville substation is needed. SCE&G would not be able to switch the Prichardville load to the other substations in the area following a loss of this line. For these reasons, transmission lines are generally only placed underground when there is no other viable overhead corridor such as near airports or in heavily congested urban areas where there are tall buildings to navigate around and underground tunnels usually already exist for placing public facilities. Such is plainly not the case here, and spending additional money to bury the Pritchardville 115 kV Line is not in the best interests of SCE&G and its customers.

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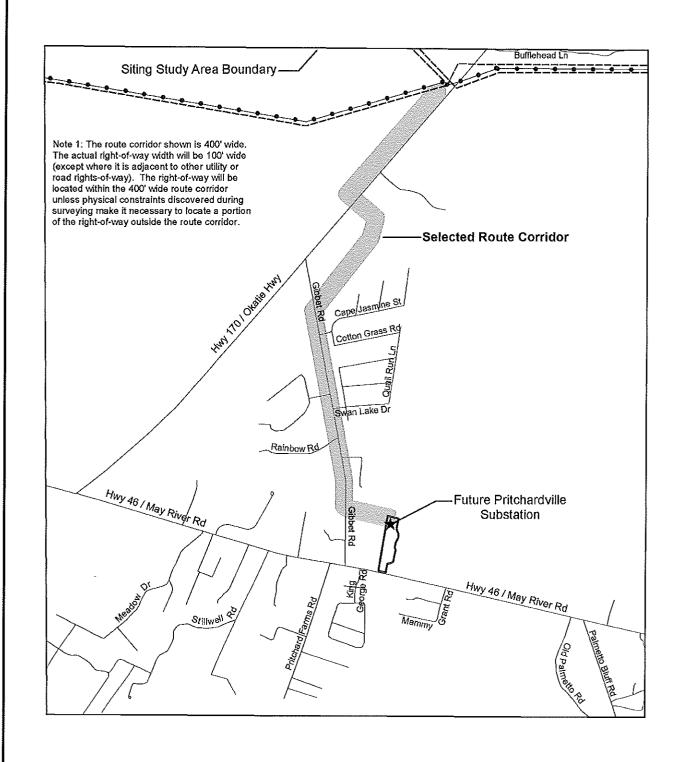
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I would point out that SCE&G is not unsympathetic to the Smiths' concerns about the aesthetics of the new overhead transmission line. In an effort to minimize the visual effects of the new Pritchardville 115 kV Line, SCE&G, among other things, entered into an agreement with Palmetto Electric Cooperative, Inc. ("Palmetto"), whereby Palmetto agreed to bury an existing Palmetto electrical distribution line running along Gibbet Road. It should be noted that lower-voltage distribution lines are not as technically complex or as material-intensive as the higher-voltage transmission lines, and so burying the distribution lines is not as

- 1 cost-prohibitive as burying transmission lines. The agreement with Palmetto also
- 2 allowed SCE&G to minimize right-of-way needs.

3 Q. WHAT ARE YOU ASKING THIS COMMISSION TO DO?

- 4 A. SCE&G respectfully asks that the Commission dismiss Smiths' complaint
- 5 with prejudice and deny the relief requested.
- 6 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?
- 7 A. Yes.



Siting Study Area Map Showing Selected Route Corridor Location



For The Future
Pritchardville 115 kV Transmission Line

Beaufort County, South Carolina

D 2009 4.00 Feet

